

**PUBLIC-REDACTED VERSION OF
DOCUMENT FILED UNDER SEAL**

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MONARCH NETWORKING
SOLUTIONS LLC,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Civil Action No. 2:20-CV-00015-JRG

JURY TRIAL DEMANDED

PUBLIC-REDACTED VERSION

**DECLARATION OF LINDSEY E. MILLER IN SUPPORT OF DEFENDANT'S
OPPOSITION TO PLAINTIFF'S MOTION TO STRIKE CERTAIN OPINIONS OF
DEFENDANT'S EXPERT MARCUS READING**

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I, Lindsey Miller, declare:

1. I am an attorney at the law firm Desmarais LLP, counsel for Defendant Cisco Systems, Inc. (“Cisco”) in the above captioned matter. I am admitted *pro hoc vice* to this Court. I submit this declaration based on personal knowledge, and if called upon as a witness, I could competently testify to the truth of each statement herein.

2. I make this declaration in support of Defendant’s Opposition to Plaintiff’s Motion to Strike Certain Opinions of Defendant’s Expert Marcus Reading, submitted concurrently.

3. Attached as Exhibit 1 is a true and accurate copy of excerpts of the February 9, 2021 Expert Report of Marcus D. Reading and the Errata to the February 9, 2021 Report of Marcus D. Reading, served in the Eastern District of Texas case *Monarch Networking Solutions LLC v. Cisco Systems, Inc.*, No. 2:20-cv-00015-JRG, with annotations added for clarity (filed under seal).

4. Attached as Exhibit 2 is a true and accurate copy of excerpts of the transcript of the February 23, 2021 deposition of Marcus Reading in the Eastern District of Texas case *Monarch Networking Solutions LLC v. Cisco Systems, Inc.*, No. 2:20-cv-00015-JRG, with annotations added for clarity (filed under seal).

5. Attached as Exhibit 3 is a true and accurate copy of excerpts of the Expert Report of Kevin Jeffay Regarding Non-Infringement of U.S. Patent Nos. 8,130,775; 8,451,844; and 9,019,065, served in the Eastern District of Texas case *Monarch Networking Solutions LLC v. Cisco Systems, Inc.*, No. 2:20-cv-00015-JRG on February 9, 2021, with annotations added for clarity (filed under seal).

6. Attached as Exhibit 4 is a true and accurate copy of excerpts of the Expert Report of Michael J. Lasinski, served in the Eastern District of Texas case *Monarch Networking Solutions*

**PUBLIC-REDACTED VERSION OF
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LLC v. Cisco Systems, Inc., No. 2:20-cv-00015-JRG on January 12, 2021, with annotations added for clarity (filed under seal).

7. Attached as Exhibit 5 is a true and accurate copy of excerpts of the transcript of the February 17, 2021 deposition of Michael J. Lasinski in the Eastern District of Texas case *Monarch Networking Solutions LLC v. Cisco Systems, Inc.*, No. 2:20-cv-00015-JRG, with annotations added for clarity (filed under seal).

8. Attached as Exhibit 6 is a true and accurate copy of excerpts of the transcript of the December 22, 2020 deposition of [REDACTED] in the Eastern District of Texas case *Monarch Networking Solutions LLC v. Cisco Systems, Inc.*, No. 2:20-cv-00015-JRG, with annotations added for clarity (filed under seal).

9. Attached as Exhibit 7 is a true and accurate copy of excerpts of Defendant Cisco Systems, Inc.'s Objections and Responses to Plaintiff Monarch Networking Solutions LLC's First Set of Common Interrogatories to Defendant (Nos. 1-11), served in the Eastern District of Texas case *Monarch Networking Solutions LLC v. Cisco Systems, Inc.*, No. 2:20-cv-00015-JRG on July 27, 2020, with annotations added for clarity (filed under seal).

10. Attached as Exhibit 8 is a true and accurate copy of excerpts of Plaintiff's Fourth Set of Interrogatories to Cisco (Nos. 12-19), served in the Eastern District of Texas case *Monarch Networking Solutions LLC v. Cisco Systems, Inc.*, No. 2:20-cv-00015-JRG on November 13, 2020, with annotations added for clarity.

11. Attached as Exhibit 9 is a true and accurate copy of excerpts of Defendant Cisco Systems, Inc.'s Supplemental Objections and Responses to Plaintiff Monarch Networking Solutions LLC's Common Interrogatories Nos. 6-11, 14, 18 and Individual Interrogatory Nos. 1-3 to Defendants, served in the Eastern District of Texas case *Monarch Networking Solutions LLC*

**PUBLIC-REDACTED VERSION OF
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v. Cisco Systems, Inc., No. 2:20-cv-00015-JRG on January 11, 2021, with annotations added for clarity (filed under seal).

12. Attached as Exhibit 10 are true and accurate copies of excerpts of [REDACTED]
[REDACTED] bearing Bates numbers CISCO-MON-EDT-00033390, CISCO-MON-EDT-00033330, CISCO-MON-EDT-00033359, CISCO-MON-EDT-00033388 with annotations added for clarity (filed under seal).

13. Attached as Exhibit 11 is a true and accurate copy of excerpts of a document titled [REDACTED]
[REDACTED] bearing Bates number CISCO-MON-EDT-00033486, with annotations added for clarity (filed under seal).

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Dated: March 15, 2021

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